



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

NOV 03 2017

Michael E. Schrier, Director of Design & STEM Projects
University of Connecticut
University Planning, Design, & Construction
31 LeDoyt Road, Unit 3038
Storrs, Connecticut 06269

Re: PCB Alternative Decontamination, Cleanup and Disposal Approval under 40 CFR
§§ 761.61(a) and (c) and § 761.79(h)
University of Connecticut - Edward V. Gant Science Complex
Storrs, Connecticut

Dear Mr. Schrier:

This is in response to the University of Connecticut (UConn) Notification¹ for approval of a proposed plan to address PCB contamination located in the building known as the Edward V. Gant Science Complex (the Site), 196 Auditorium Road, Storrs, Connecticut. PCB-contaminated building materials that are not authorized for use under 40 CFR § 761.30 and thus are prohibited under 761.20(a) are located at the Site. Specifically, PCBs have been found in caulk, glazing and paint at greater than or equal to (" \geq ") 50 parts per million ("ppm"). Building materials and exterior surface ground covers located adjacent to the caulk, glazing, and paints were found to contain PCBs at greater than (" $>$ ") 1 ppm.

The Toxic Substances Control Act ("TSCA") and its implementing regulations at 40 CFR Part 761 generally prohibit the use of PCBs in any manner other than in a totally enclosed manner unless authorized by rule. The prohibition on use includes the use of products manufactured with PCBs (e.g., caulk) in concentrations \geq 50 ppm and materials that are contaminated with PCBs from such sources (i.e., *PCB remediation waste*). PCB-containing manufactured non-liquid products must be removed and disposed of as *PCB bulk product waste* in accordance with 40 CFR § 761.62. Forty CFR § 761.30(u) authorizes the use of certain materials, including *PCB remediation waste*, provided such materials are decontaminated in accordance with such regulations.

¹ The Notification was prepared by Tighe & Bond, on behalf of UConn to satisfy the requirements under 40 CFR §§ 761.61(a) and (c) and § 761.79(h). Information was submitted dated April 26, 2017 (Self-Implementing Cleanup & Disposal Plan & Risk-based Disposal Plan), August 21, 2017 (Revised Self-Implementing Cleanup & Disposal Plan & Risk-based Disposal Plan and Response to EPA comments), September 28, 2017 (email response to outreach question); and, October 24, 2017 (email response to disposal question). These submittals shall be referred to as the "Notification".

In its Notification, UConn has proposed the following PCB remediation plan:

- Remove *PCB bulk product waste* (i.e., beige and white paint; white/gray and gray expansion joint caulk; black caulk (type 1 and 80 linear feet (lf) of type 2) and glazing (types 1 and 2) and associated window frames and glass along with one brick from the south facing window(s) with the exception of the 1st floor windows; 216 sf of cement panels, in the connectors, coated with black-painted white caulk, and, gray column caulk; and, brown cove base, adhesive, and one course of painted brick/concrete masonry unit (CMU) in contact with the adhesive, and dispose in accordance with 40 CFR § 761.62(b)
- Remove *PCB remediation waste* (i.e., 122 rooftop pavers, 100 sf of concrete slab adjacent to exterior north and west column caulk joints, window frames, replacement interior/exterior caulking, and one exterior and interior brick from around the windows associated with the southern classrooms/offices (first floor windows)) and dispose in accordance with § 761.61(a)(5)(i)(B)(2)(iii)
- Collect PCB samples from decontaminated *porous surfaces* (i.e., structural brick wall, roof pavers, exterior concrete slab) in accordance with 40 CFR Part 761 Subpart O to confirm the less than or equal to (\leq) 1 ppm PCB cleanup standard has been met
- Collect PCB samples from decontaminated *porous surfaces* to remain (i.e., interior CMU walls at a distance of 6 inches from the expansion joint and brick directly adjacent to the expansion joint) in accordance with the Notification and from *non-porous surfaces* (i.e., sealed terrazzo floor) in accordance with 40 CFR 761 Subpart P to confirm the \leq 1 ppm and less than ($<$) 1 $\mu\text{g}/100\text{ cm}^2$ PCB cleanup standards have been met
- Encapsulate, with an epoxy coating, PCB-contaminated *porous surfaces* (i.e., all surfaces of the interior structural concrete columns; 6 inches from the caulk joint for structural concrete beams and columns around window openings (i.e., framing), for perimeter CMU walls and for exterior structural concrete; the concrete header 3 inches from the caulk joint; and 6 inches above the floor for interior structural brick and CMU)
- Temporarily encapsulate, with metal stripping, the remaining 200 lf of interior and 220 lf of exterior black type 2 PCB caulk associated with the southwest corridor, until Phase 2 when the caulk is scheduled for removal
- Collect PCB samples of the encapsulated *porous surfaces* to confirm the effectiveness of the encapsulation procedure

UConn has determined that certain glazing sealants, caulk, and paint which have PCB concentrations at less than (\leq) 50 parts per million (ppm) are *Excluded PCB Products*. Under the PCB regulations, there is no requirement to remove these products or to decontaminate surfaces that are in contact with these products. However, as indicated in the Notification, these materials will be removed and disposed of under the Connecticut Department of Energy and Environmental Protection (CTDEEP) Regulations. Please be aware that should UConn determine that any of these products do not meet the criteria for classification as *Excluded PCB Products*, the cleanup and disposal requirements under 40 CFR Part 761 shall apply.

Based on its review of the information provided in the Notification pertaining to encapsulation of > 1 ppm PCB-contaminated *porous surfaces* that meet the definition of a *PCB remediation waste*, EPA has determined that the proposed risk-based disposal plan is acceptable and that the PCBs remaining at the Site will not pose an unreasonable risk of injury to health or the environment provided encapsulants are maintained. EPA applies this no unreasonable risk standard in accordance with the PCB regulations at 40 CFR § 761.61(c) and the Toxic Substances Control Act, at 15 USC § 2605(e).

With respect to the alternative verification sampling frequency for non-structural CMU and brick, based on the results of the PCB sampling to-date and the proposed decontamination and removal procedures, EPA has determined that the alternative sampling frequency will be adequate to confirm that PCB cleanup standard has been met. EPA finds that the alternative sampling frequency proposed by UConn will not create an unreasonable risk to public health or the environment and EPA may approve the sampling under § 761.61(c).

UConn may proceed with its project in accordance with 40 CFR §§ 761.61(a) and (c); § 761.79(h); its Notification; and, this Approval, subject to the conditions of Attachment 1. EPA is reserving its rights to require additional investigation or mitigation measures should EPA determine that long-term requirements are not being implemented and/or the results of the long-term monitoring indicate that PCBs at the Site pose an unreasonable risk of injury to the building users.

This Approval addresses only the cleanup, decontamination, and disposal of *PCB remediation waste* associated with the Phase 1 renovation project. The Approval does not address *Excluded PCB Products*, the approximately 200 lf of interior and exterior Type 2 black caulk remaining in the southwest corridor, or PCBs identified in the Phase 2 and Phase 3 renovation areas.

EPA encourages the compliance with greener cleanup practices for all cleanup projects, and recommends adherence to the ASTM Standard Guide to Greener Cleanups E2893-16 (Guide) for work conducted under this Approval and the Notification. Greener cleanups is the practice of integrating options that minimize the environmental impacts of cleanup actions in order to incorporate practices that maximize environmental and human benefit. Please see Section 6 of the Guide for the Best Management Practices (BMP) Process published May 2016 (See www.astm.org/Standards/E2893.htm for additional information). EPA encourages you to review the Guide and implement any practices that are feasible. If implemented, the PCB Completion Report (see Attachment 1, Condition 33) should include a section on BMP Documentation, as described in Section 6.6.5 of the Guide.

Questions and correspondence regarding this Approval should be directed to:

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Tisa.Kimberly@epa.gov

EPA shall consider the work authorized under this Approval complete only when it has received documents evidencing construction of the physical controls at the Site (e.g., encapsulation, etc.), adoption of the deed restriction, acceptable post-abatement indoor air and surface wipe PCB concentrations, and establishment of a long-term maintenance and monitoring plan. EPA may request any additional information necessary to establish that the work has been completed in accordance with 40 CFR Part 761, the Notification, and this Approval.

Sincerely,

A handwritten signature in black ink, appearing to read "Bryan Olson", with a long horizontal flourish extending to the right.

Bryan Olson, Director
Office of Site Remediation & Restoration

cc James T. Olsen, Tighe & Bond
Gary Trombly, CTDEEP
File

Attachment 1 – PCB Approval Conditions

ATTACHMENT 1:

**PCB DECONTAMINATION, CLEANUP AND DISPOSAL APPROVAL CONDITIONS
EDWARD V. GANT SCIENCE COMPLEX
196 AUDITION ROAD
STORRS, CONNECTICUT**

GENERAL CONDITIONS

1. This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2605(e), and the PCB regulations at 40 CFR Part 761, and applies solely to the *PCB remediation waste* and *PCB bulk product waste* identified in the Notification that shall be addressed during the Phase 1 renovation, specifically, the South Wing, Southwest Connector, and the Plaza renovation work, hereinafter “the Site”.
 - a. This Approval does not address *Excluded PCB Products*, the approximately 200 lf of interior and exterior Type 2 black caulk remaining in the southwest corridor, or PCBs that are identified in the Phase 2 and Phase 3 areas of the Site. The University of Connecticut (UConn) may submit a separate plan to address the PCBs identified in these future phases, or may request that EPA consider a modification to the Notification to incorporate cleanup of such PCBs under this Approval in accordance with Condition 24.
2. UConn shall conduct on-site activities in accordance with the conditions of this Approval and with the Notification.
3. In the event that the plan described in the Notification differs from the conditions specified in this Approval, the conditions of this Approval shall govern.
4. The terms and abbreviations used herein shall have the meanings as defined in 40 CFR § 761.3 unless otherwise defined within this Approval.
5. UConn must comply with all applicable federal, state and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items and decontamination wastes generated under this Approval. In the event of a new spill during response actions, UConn shall contact EPA within 24 hours for direction on PCB cleanup and sampling requirements.
6. UConn is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in activities conducted under this Approval. If at any time UConn has or receives information indicating that UConn or any other person has failed, or may have failed, to comply with any provision of this Approval, it must report the information to EPA in writing within 24 hours of having or receiving the information.

7. This Approval does not constitute a determination by EPA that the transporters or disposal facilities selected by UConn are authorized to conduct the activities set forth in the Notification. UConn is responsible for ensuring that its selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state and local statutes and regulations.
8. This Approval does not: 1) waive or compromise EPA's enforcement and regulatory authority; 2) release UConn from compliance with any applicable requirements of federal, state or local law; or 3) release UConn from liability for, or otherwise resolve any violations of federal, state or local law.
9. Failure to comply with the Approval conditions specified herein shall constitute a violation of the requirement in § 761.50(a) to store or dispose of PCB waste in accordance with 40 CFR Part 761 Subpart D.

NOTIFICATION AND CERTIFICATION CONDITIONS

10. This Approval may be revoked if the EPA does not receive written notification from UConn of its acceptance of the conditions of this Approval within 10 business days of receipt.
11. UConn shall submit the following information to EPA:
 - a. a certification signed by its selected abatement/demolition contractor, stating that the contractor(s) has read and understands the Notification, and agrees to abide by the conditions specified in this Approval;
 - b. the name of the disposal facility(ies) for each waste stream prior to shipment of PCB waste from the Site; and,
 - c. a certification signed by the selected analytical laboratory, stating that the laboratory has read and understands the extraction and analytical method requirements and quality assurance requirements specified in the Notification and in this Approval.

CLEANUP, DECONTAMINATION AND DISPOSAL CONDITIONS

12. To the maximum extent practical, engineering controls, such as barriers, and removal techniques, such as the use of HEPA ventilated tools, shall be utilized during removal processes. In addition, to the maximum extent possible, disposable equipment and materials, including PPE, will be used to reduce the amount of decontamination necessary.

13. All visible greater than or equal to (\geq) 50 parts per million (ppm) PCB-containing caulk, glazing, paint and associated building substrates (e.g., bricks a minimum of one brick from the south facing curtain wall window caulk joint; interior, non-structural concrete masonry unit (CMU) walls a minimum of 6 inches from the caulk joint; rooftop pavers; and exterior concrete slab) shall be removed and/or cleaned as described in the Notification. The decontamination standard for *porous surfaces* to remain shall be less than or equal to (\leq) 1 part per million (ppm) or alternatively, these *porous surfaces* shall be encapsulated as described in the Notification with post-encapsulation sampling to confirm the efficacy of the encapsulation process (see Condition 14). The decontamination standard for *non-porous surfaces* shall be $\leq 1 \mu\text{g}/100 \text{ cm}^2$.
- a. *Porous surfaces* samples shall be collected on a bulk basis (i.e., mg/kg) and reported on a dry weight analysis. Sampling for *porous surfaces* shall be conducted in accordance with the EPA Region 1 *Standard Operating Procedure for Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBs) Revision 4, May 5, 2011*, at a maximum depth interval of 0.5 inches. Verification samples shall be collected at the frequency specified in 40 CFR Part 761 Subpart O except at the CMU and brick walls in contact with gray and white/gray expansion joint caulk where the samples shall be collected at a minimum sampling frequency of 1 sample per 10 to 12 linear feet.
 - b. Decontaminated *non-porous surfaces* (i.e., sealed terrazzo floor) samples shall be collected on a surface area basis in accordance with the standard wipe test as specified in 40 CFR § 761.123 (i.e., $\mu\text{g}/100 \text{ cm}^2$) and Subpart P.
 - c. Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction/analytical method(s) is validated according to Subpart Q. In the event dual column confirmation is used for PCB analysis, PCB analytical results for both columns shall be reported or alternatively, the highest PCB analytical result shall be reported.
14. For encapsulated PCB-contaminated *porous surfaces*, the following shall apply:
- a. Wipe sampling of encapsulated *porous surfaces* shall be performed on a surface area basis by the standard wipe test as specified in 40 CFR § 761.123 (i.e., $\mu\text{g}/100 \text{ cm}^2$). Chemical extraction for PCBs shall be conducted using Method 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction or analytical method(s) is validated according to Subpart Q.
 - b. In the event that the PCB concentration of any wipe sample is greater than ($>$) $1 \mu\text{g}/100 \text{ cm}^2$, and if this standard cannot be achieved with the application of additional encapsulant, UConn shall contact EPA for further discussion and direction on alternatives.

- c. UConn shall submit a long-term monitoring and maintenance plan (MMP) for encapsulated surfaces as required under Attachment 1, Condition 22.
15. UConn shall conduct post-abatement indoor surface sampling and indoor air sampling following completion of the Phase 1 PCB work, including encapsulation activities:
- a. Wipe sampling of non-encapsulated indoor surfaces shall be performed on a surface area basis by the standard wipe test as specified in 40 CFR § 761.123 (i.e., $\mu\text{g}/100\text{ cm}^2$). Chemical extraction for PCBs shall be conducted using Method 3500B/3540C of SW-846 and chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another method(s) is validated according to Subpart Q. The laboratory reporting limit shall be $\leq 1\text{ }\mu\text{g}/100\text{ cm}^2$.
 - b. Indoor air sampling shall be conducted in accordance with EPA Method TO-10A or EPA Method TO-4A. Sufficient sample volumes shall be collected to provide a laboratory reporting limit of $\leq 0.05\text{ }\mu\text{g}/\text{m}^3$ for total PCBs. PCB analysis shall be conducted for PCB homologues and/or PCB congeners.
 - c. In the event that the PCB concentration of any wipe sample is $> 1\text{ }\mu\text{g}/100\text{ cm}^2$, or if indoor air total PCB concentrations are $> 0.40\text{ }\mu\text{g}/\text{m}^3$, UConn shall contact EPA for further discussion and direction on alternatives or other requirements.
 - d. UConn shall submit to EPA a proposed long-term monitoring and maintenance plan (MMP) for indoor air and surfaces as required under Attachment 1, Condition 22.
16. PCB waste (at any concentration) generated as a result of the activities described in the Notification, excluding any decontaminated materials, shall be marked in accordance with CFR 40 CFR § 761.40; stored in a manner consistent with 40 CFR § 761.65; and, disposed of in accordance with 40 CFR § 761.61 or § 761.62, unless otherwise specified below.
- a. Decontamination wastes and residues shall be disposed of in accordance with 40 CFR § 761.79(g)(6).
 - b. Moveable equipment, tools, and sampling equipment shall be decontaminated in accordance with either 40 CFR § 761.79(b)(3)(i)(A), § 761.79(b)(3)(ii)(A), or § 761.79(c)(2).
 - c. PCB-contaminated water generated during decontamination shall be decontaminated in accordance with 40 CFR § 761.79(b)(1) or disposed of under § 761.60.

DEED RESTRICTION AND USE CONDITIONS

17. Within sixty (60) days of completing all PCB-related activities associated with the full renovation project (Phases 1 through 3), UConn shall submit for EPA review and approval, a draft deed restriction that shall include: a description of the extent and levels of contamination at the property following abatement; a description of the PCB remedial actions taken at the property; a description of the use restrictions for the property, if applicable; and the long-term monitoring and maintenance requirements, which may be addressed in the monitoring and maintenance plan (MMP, see Condition 22). Within seven (7) business days of receipt of EPA's approval of the draft deed restriction, UConn shall record the deed restriction. A copy of this Approval shall be attached to the deed restriction.
18. Within ten (10) business days of recording the deed restriction, UConn shall submit to EPA a certification as required under 40 CFR § 761.61(a)(8)(i)(B), that it has recorded the notation on the deed with a copy of the executed deed restriction.

SALE, LEASE, OR TRANSFER CONDITIONS

19. The Site Owner shall notify the EPA of the sale, lease or transfer of any real estate interest in the Site that has an effect of allocating or sharing any responsibility for complying with this Approval to or with a different person. Such notice shall be in writing no later than 60 days prior to such action. This notification shall include the name, address, and telephone number of the new entity acquiring such an interest in the Site. In the event that Site Owner sells, leases, or transfers any such real estate interest, the Site Owner shall continue to be bound by all the terms and conditions of this Approval, unless EPA allocates some or all of this Approval's responsibilities to the new owner(s), lessee or transferee. The notification procedures are as follows:
 - a. The new owner(s), lessee or transferee must request, in writing, that the EPA transfer some or all obligations and responsibilities under the Approval to the new owner(s), lessee or transferee;
 - b. The EPA reviews the request, and determines whether to allocate some or all of the obligations and responsibilities under the Approval to the new owner(s), lessee, or transferee; and,
 - c. The new owner(s), lessee or transferee provides written notification to the EPA of its acceptance of and intention to comply with the terms and conditions of the Approval or new approval, should EPA deem a new approval is necessary. The Approval or new approval may be withdrawn if the EPA does not receive written notification from the new owner(s), lessee or transferee of its acceptance of, and intention to comply with, the terms and conditions of the Approval or new approval within 30 days of its receipt of the Approval or the new approval. Under such circumstances, all terms and conditions of this Approval will continue to be binding on the Site Owner.

20. In the event that the sale, lease or transfer of a real estate interest in the Site will involve or result in a change in the use of the Site that was not considered in the Notification, EPA may revoke, suspend, and/or modify this Approval or the new approval if it finds, due to the change in use, that this risk-based disposal action will pose an unreasonable risk of injury to health or the environment. The new owner, lessee or transferee shall record any amendment to the deed restriction, resulting from any approved modification(s), within 60 days of such change(s).
21. In any sale, lease or transfer of a real estate interest in the Site, the Site Owner shall retain sufficient access rights to enable it to continue to meet its obligations under this Approval, except as provided above.

INSPECTION, MODIFICATION AND REVOCATION CONDITIONS

22. Within 60 days of completing the activities associated with the Phase 1 PCB work, UConn shall submit for EPA's review and approval, a detailed MMP for the epoxy coating and surfaces and for indoor air. UConn shall incorporate any changes to the MMP required by EPA.
 - a. The MMP shall include: a description of the activities that will be conducted, including inspection criteria, frequency, and routine maintenance activities; sampling protocols, sampling frequency, and analytical criteria; and, reporting requirements, as applicable.
 - b. The MMP shall include a communications component which details how the maintenance and monitoring results will be communicated to the Site users, including building users, other on-site workers, and interested stakeholders.
 - c. The MMP also shall include a worker training component for maintenance workers or for any person that will be conducting work that could impact the encapsulants.
 - d. UConn shall submit the results of these long-term monitoring and maintenance activities to EPA. Based on its review of the results, EPA may determine that modification to the MMP is necessary in order to monitor and/or evaluate the long-term effectiveness of the encapsulation procedure to ensure that there is no unreasonable risk of injury to health or the environment from PCBs remaining at the Site.
 - e. This MMP shall be amended after each subsequent PCB work phase, to incorporate long-term monitoring and maintenance requirements for PCBs remaining within the Phase 2 and Phase 3 renovation areas, as applicable.
 - f. Activities required under the MMP shall be conducted until such time that EPA determines, in writing, that such activities are no longer necessary.

23. UConn shall allow any authorized representative of the Administrator of the EPA to inspect the Site and to inspect records and take samples as may be necessary to determine compliance with the PCB regulations and this Approval. Any refusal by UConn to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.
24. Any modification(s) in the plan, specifications, and information submitted by UConn, contained in the Notification, and forming the basis upon which this Approval has been issued, must receive prior written approval from the EPA. UConn shall inform the EPA of any modification, in writing, at least ten (10) days prior to such change. No action may be taken to implement any such modification unless the EPA has approved of the modification, in writing. The EPA may request additional information in order to determine whether to approve the modification.
25. If such modification involves a change in the use of the Site which results in exposures not considered in the Notification, the EPA may revoke, suspend, and/or modify this Approval upon finding that this risk-based cleanup and disposal action may pose an unreasonable risk of injury to health or the environment due to the change in use. EPA may take similar action if the EPA does not receive requested information needed from UConn to make a determination regarding potential risk.
26. UConn shall record any amendment to the deed restriction, resulting from any approved change or modification(s), within sixty (60) days of such change(s). (See Condition 17).
27. Any departure from the conditions of this Approval without prior, written authorization from the EPA may result in the revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.
28. Any misrepresentation or omission of any material fact in the Notification or in any records or reports may result in the EPA's revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.
29. Approval for these activities may be revoked, modified or otherwise altered if: EPA finds a violation of the conditions of this Approval or of 40 CFR Part 761, including EPA's PCB Spill Cleanup Policy, or other applicable rules and regulations; EPA finds that the PCBs remaining at the Site present an unreasonable risk of injury to health or the environment; EPA finds that the institutional and engineered controls are not effective in preventing PCB exposure; EPA finds that there is migration of PCBs from the Site; or EPA finds that changes are necessary to comply with new rules, standards, or guidance for such approvals. UConn may apply for appropriate modifications in the event new rules, standards, or guidance come into effect.

RECORDKEEPING AND REPORTING CONDITIONS

30. UConn shall prepare and maintain all records and documents required by 40 CFR Part 761, including but not limited to the records required under Subparts J and K. A written record of the decontamination, cleanup and disposal and the analytical sampling shall be established and maintained by UConn in one centralized location, until such time as EPA approves in writing a request for an alternative disposition of such records. All records shall be made available for inspection to authorized representatives of EPA.
31. As required under Condition 22 of this Approval, UConn shall submit the results of the long-term monitoring and maintenance activities to EPA as specified in the final MMP to be approved by EPA.
32. As required under Condition 18 of this Approval, UConn shall submit documentation that it has recorded the deed restriction on the property, as applicable.
33. UConn shall submit a Final PCB Completion Report (Report) to EPA as a hardcopy and electronic format (e.g., CD-ROM), within 60 days of completion of the Phase 1 activities authorized under this Approval. At a minimum, this Report shall include: a discussion of the project activities, including photo-documentation and Greener Cleanups BMPs, if implemented; characterization and confirmation sampling analytical results (as applicable); copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; an estimate of the quantity of PCB waste disposed of and the size of the remediated area(s); copies of manifests and/or bills of lading; copies of certificates of disposal or similar certifications issued by the disposer; and an estimate of the cost of the PCB work completed under this Approval, if known.
34. Required submittals shall be mailed to:

Kimberly N. Tisa, PCB Coordinator
United States Environmental Protection Agency
5 Post Office Square, Suite 100 - (OSRR07-2)
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
35. No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self-disclosure or penalty policies.

END OF ATTACHMENT 1